

REMARKS

The examiner has again rejected the claims under 35 USC 103 as obvious over the prior art of Witt in view of MacPhail. The examiner is urged to reconsider and withdraw his rejection.

In our previous response we added language to the independent claim to further distinguish it from the invention of Witt, which provides only protection against accidental changes to executable files, not strict enforcement of retention requirements by redundant dispersal of data across a distributed system, with independent enforcement of retention rules at each storage site.

The examiner objected to the term "failure event" in our added language as being overly broad, seeming to infer that the added limitation could be interpreted as claiming that our invention provides protection from all failure events. In response we have modified the relevant clause to make it clear that the failure event is limited to a single site.

We also urge the examiner to note the weak form of protection afforded by Witt, which does not teach independent enforcement of retention rules at distributed storage sites: neither the word "independent" nor the word "distributed" appear anywhere in the Witt disclosure. The discussion of copy-on-write with copy-back that the examiner alludes to as teaching this feature would not operate independently at different sites in any standard distributed file system. Moreover, Witt also considers an override mechanism a necessary part of his invention for clients authorized to install files (Col 8, lines 53--59), and bases protection entirely on hashes of file contents (Col 6, lines 22--29). In contrast, the present invention requires clients that are able to deposit files but can't delete them (e.g., "wherein a second request, sent by the client program after the first request, would enable the entity version to be deleted from all of the plurality of storage sites in violation of the restriction caused by the first request, and the second request is denied"), and requires the protection to be based, at least in part, on a time determined by the client doing the depositing ("wherein the shared set of rules restrict deletion, based at least in part upon a time that was associated with the entity version in response to a request by the client program").

Thus the independent claim is allowable over the art of record. We have also added clarifying language to the preamble of this claim, and a clause to make it clearer that the present

invention is a storage system, with storage and retrieval by storage clients. Finally, we changed the phrase "part of the contents of the entity version" to "part of the information contained in the entity version" in order to make it clearer that the portions referred to could be encoded fragments, as is described in the disclosure (US20040167938, for example paragraph [0133]).

No changes have been made in the dependent claims, which are properly dependent on claim 62 and hence are allowable therewith. Each of the dependent claims adds one or more further limitations to claim 62 that enhance patentability, but those limitations are not presently relied upon. For that reason, and not because applicants agree with the examiner, no rebuttal is offered to the examiner's rejections of the dependent claims.

Allowance of the application is requested.

Please apply any other charges or credits to deposit account 061050.

Respectfully submitted,

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